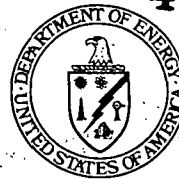




Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



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AUG 26 2002

Mr. Gene Jablonowski, Remedial Project Manager
United States Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0676-02

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Jablonowski and Mr. Schneider:

**RESPONSE TO COMMENTS CONCERNING THE FINAL IMPLEMENTATION PLAN FOR
ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT OF THE PLANT 1
COMPLEX - PHASE II PROJECT**

- References:
1. Letter from G. Jablonowski to J. W. Reising, "Disapproval of the Plant 1 Complex - Phase II Implementation Plan for Above-Grade Decontamination and Dismantlement," dated July 26, 2002
 2. Letter from T. A. Schneider to J. Reising, "Re: Conditional Approval Plant 1 Complex - Phase II Decontamination and Dismantlement Plan," dated July 16, 2002

This letter transmits the response to comments concerning the Final Implementation Plan for Above-Grade Decontamination and Dismantlement (D&D) of the Plant 1 Complex - Phase II Project to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) for their approval.

Additionally, a copy of each page change resulting from the comments resolution is included with this transmittal. Please remove the existing implementation plan pages affected by this change and replace them with the enclosure.



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AUG 26 2002

DOE-0676-02

Mr. Gene Jablonowski
Mr. Tom Schneider

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If you have any questions, please contact Anand Shah at (513) 648-3146.

Sincerely,



FEMP:Shah

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosure: As Stated

cc w/enclosure:

J. McCloskey, EM-31/CLOV
J. Trygier, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosures)
J. Saric, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
T. Hagen, Fluor Fernald, Inc./MS9
M. Stevens, Fluor Fernald, Inc./MS87
ECDC, Fluor Fernald, Inc./MS52-7

Mr. Stephen H. McCracken
Letter No. C:EXPD:2002-0058

**PLANT 1 COMPLEX – PHASE II IMPLEMENTATION PLAN FOR ABOVE-GRADE
DECONTAMINATION AND DISMANTLEMENT
USEPA AND OEPA COMMENT RESOLUTIONS**

USEPA Comment: Table 2-2 indicates that Building 71 and G-008 are assumed to contain asbestos-containing material (ACM). However, Table 2-3 on Page 13 does not present information on ACM disposal. The table should be revised to address this inconsistency.

Response: Table 2-3 has been revised to include the ACM in Building 71 and G-008. Likewise, Tables 2-4 and 2-5 have been revised to include the ACM in G-008.

USEPA Comment: The text stated that the dismantlement of Building 56A will generate structural steel, metal siding and roofing, piping, conduit and wire, and other miscellaneous steel materials. The text does not indicate if the concrete base will be dismantled, and if so, how will it be dismantled. The text should be revised to address this issue.

Response: The OU3 Implementation Plans have been specifically developed for above-grade dismantlement of structures and do not address or include "at-and below-grade dismantlement". Section 3.2.7 of the OU3 Integrated Remedial Design/Remedial Action Work Plan discusses at- and below-grade dismantlement of OU3 structures and components. This text defines "at- and below-grade dismantlement" as the removal of floor slabs, foundation walls, footings, underground tanks, underground utilities, underground asbestos and piping, roads and railroads, material in ponds and basins, and other at- and below-grade items and associated impacted material management activities.

In general, removal of at- and below-grade portions of OU3 structures will be performed in conjunction with soil excavation activities. The one exception is the scabbling/removal of four concrete areas (i.e., floor slabs) that contain levels of Tc-99 higher than the On-Site Disposal Facility's waste acceptance criteria. These four areas are delineated in the OU3 Record of Decision for Final Remedial Action and do not affect the dismantlement of Building 56A. The Building 56A concrete base will be remediated in accordance with the Integrated Remedial Design Package for soil remediation of Areas 3B, 4B, and 5 which is scheduled to be submitted to the regulatory agencies for review by September 30, 2002. No change will be made to the Implementation Plan.

OEPA Comment: Specification 01789-TS-0001, Part 3.2 B1 states that the Contractor should fill large openings (e.g., pits, sumps, ect.) in slabs with granular fill material to within 2 inches of grade. In the past, clean, off-site granular material has been used. Contaminated fill from the site should be used in lieu of clean material. Contaminated granular

Mr. Stephen H. McCracken
Letter No. C:EXPD:2002-0058

4444

material or crushed concrete are both acceptable. If concrete rubble is used and the top layer needs to be graded smooth, it is acceptable to top the rubble with clean gravel.

Response:

The specifications have been modified to allow the use of contaminated fill material or crushed concrete, if available.